

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LESTER LEE JAVIER,

Plaintiff,

-VS-

MARISSA TEVES BECK, HENRY R. BECK,
MEDICAL DYNAMIC SYSTEMS, INC., OASIS
PROFESSIONAL MANAGEMENT GROUP, INC.,
ADVANCED PROFESSIONAL MARKETING, INC.,
GRILL 21 LLC, PAN DE SAL LLC, and GRAMERCY
GROUP FOUR LLC,

Defendants.
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: 13 Civ. 2926 (WHP)

: **NOTICE OF MOTION**
: **TO STRIKE PLEADINGS**
: **AND FOR DEFAULT**
: **JUDGMENTS**

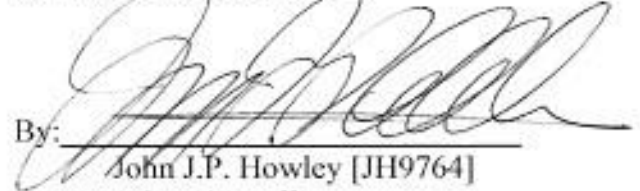
PLEASE TAKE NOTICE that, upon the annexed declaration of John J.P. Howley, executed on September 18, 2014, the exhibits annexed thereto, and the accompanying memorandum of law, plaintiff will move this Court on October 14, 2014, at 9:30 a.m. or as soon thereafter as counsel may be heard, for an Order, pursuant to the Court's August 15, 2014 Order and Federal Rule of Civil Procedure 55(a), striking the answers of defendants Medical Dynamic Systems, Inc., Oasis Professional Management Group, Inc., Advanced Professional Marketing, Inc., Grill 21, LLC, Pan de Sal LLC, and Gramercy Group Four LLC (collectively, the "Corporate Defendants"), directing the entry of default judgments against each of the Corporate Defendants on issues of liability, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served on the undersigned and filed with the Court no later than October 6, 2014, and reply papers by the

plaintiff, if any, must be served and filed no later than October 13, 2014.

Dated: New York, New York
September 18, 2014

JOHN HOWLEY, ESQ.

By: 

John J.P. Howley [JH9764]

Attorney for Plaintiff

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